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Mr. Gene Hook
Denver Department of Environmental Health
201 W. Colfax Ave, Dept 1009
Denver, CO 80202

Dear Gene:

This letter is in response to your e-mail concerning issues raised by a City and County of Denver councilperson and the Globeville community regarding the placement of soils excavated from the Vasquez Blvd/I70 (VB/I70) Superfund Site residential properties on to the ASARCO Globe Plant. In particular, this letter addresses the issues raised concerning dust control measures, air monitoring, soil metal concentrations, and truck routes. I understand other issues raised in your e-mail have been addressed by the Colorado Department of Public Health and the Environment (CDPHE).

The EPA has been and will continue to work closely with the Colorado Department of Public Health and the Environment (CDPHE) concerning the placement of VB/I70 soils on the Globe Plant. Please note that CDPHE is the lead agency for the clean up of the ASARCO Globe Site. Thus, CDPHE, with assistance from ASARCO, is developing a soil placement plan for the Globe Plant. This plan will be used by EPA to prioritize areas which VB/I70 soils will be placed on to the Globe Plant.

Detailed information regarding many of the issues raised in your e-mail can be found in the "Remedial Design Work Plan for Soil Sampling and Remediation Program for the VB/I70 Site." I have enclosed a copy of this design work plan for your reference. When this design document will provide additional information, it is so noted in the responses below.

Dust Control

Dust control measures are described in Appendix E of the Remedial Design Work Plan for Soil Sampling and Remediation Program for the VB/I70 Site. Soils are wetted prior to and during excavation to control dust during the excavation process. Thus, soils delivered to the Globe

Plant will be moist, providing for dust control. In addition, water will be applied on roadways and work areas within the Globe Plant to reduce dust.

Air Monitoring

In addition to the air quality monitoring conducted by ASARCO at the Globe Plant, EPA will use two MiniRam monitors to measure any generation of dust during placement of soils on the ASARCO Globe Plant to determine the immediate effectiveness of dust control measures. If the MiniRam monitors detect excess dust generation, dust suppression measures will be conducted. One of the MiniRam monitors will be placed upwind of the soil placement area; the second will be placed downwind of the soil placement area. The monitoring, quality assurance and quality control procedures are described in Appendix E of the Remedial Design Work Plan for Soil Sampling and Remediation Program for the VB/I70 Site.

Soil Metal Concentrations

During 2003, EPA excavated soil from 133 residential properties from the VB/I70 Site. These initial properties were remediated first since they had the highest residential soil concentrations for lead and arsenic identified within the Site. These soils have been stockpiled on the ASARCO Globe Plant and sampled for lead and arsenic. Since these stockpiled soils contain the highest levels of lead and arsenic to be removed at the VB/I70 Site, the analytical results from samples taken will be used to determined how to proceed with soil placement in the future. If the analytical results indicate that the levels of lead and arsenic are below one-half of the soil worker/trespasser action levels established for the Globe Plant, EPA will directly place soils on the Globe Plant with random sampling. EPA believes this is protective, since an environmental convent preventing residential use of the Globe Plant is to be established. Thus, a lower residential soil action level for lead and arsenic is not be warranted. The soil action levels established for lead and arsenic for the Globe Plant are 3,000 and 426 parts per million (ppm), respectively.

If the analytical results indicate that the levels of lead and arsenic are above one half the soil worker/trespasser action levels established for the Globe Plant, EPA will transport those soils off-site to an appropriate disposal facility. In this case, future soils excavated from VB/I70 residential properties would be stockpiled and sampled prior to final placement on the Globe Plant.

Truck Routes

Transportation routes to the Globe Plant will follow major streets east or west to Washington Street, then travel north to the plant. A map and more detailed description of the transportation routes are found in Appendix D, Transportation and Disposal Plan, of the Remedial Design Work Plan for Soil Sampling and Remediation Program for the VB/I70 Site.

Please contact me if you have any questions regarding these responses to the issues raised in your e-mail. I can be reached by phone at 303-312-6578.

Sincerely,

Victor Ketellapper
Project Manager

Attachment

cc: Barbara O'Grady, CDPHE (w/o attachment)
Mary Darling, Army Corps of Engineers (w/o attachment)
Michelle Smith, Project Resources, Inc. (w/o attachment)